

**IN THE UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF MISSISSIPPI  
EASTERN DISTRICT**

**MEKAIL THOMAS and  
EREAON SMITH**

**PLAINTIFFS**

**vs.**

**CIVIL ACTION NO. 2:19-CV-112-KS-MTP**

**THE CITY OF LAUREL MISSISSIPPI; THE  
LAUREL POLICE DEPARTMENT; TOMMY COX;  
MITCH SUMRALL; KEITH BLANCETT; JOSH  
FREEMAN, SKYLAR PRUNERA; BRIAN HANCOCK;  
and JOHN DOES, 1-10**

**DEFENDANTS**

**DESIGNATION OF EXPERT WITNESS**

COMES NOW the Plaintiffs, Mekail Thomas and Ereaon Smith, by and through undersigned counsel, and files this, their Designation of Expert Witness, pursuant to F.R.C.P. 26 and hereby designated his expert witness as follows:

1. a. The Plaintiffs have consulted W. Lloyd Grafton, Ph.D., police policy and procedure expert, who is located at 3896 Hwy 33, Ruston, Louisiana and who has been qualified in Federal District Courts as an expert witness and also accepted in Louisiana, Mississippi, and Texas State Courts as an expert. Dr. Grafton is a retained expert who has knowledge of and holds opinions related to the standard of care owed to Mekail Thomas and Ereaon Smith by the Laurel Police Department on the date complained of in this cause of action, and the appropriate protocols and procedures that should have been in effect and followed.

b. If called as a witness at the trial of this matter, Dr. Grafton will provide testimony that his opinion is that the shooting was out of policy and objectively unreasonable. This opinion will be augmented as discovery proceeds.

**EX. "A"**

c. The grounds and basis for his opinion are his knowledge, professional opinion, experience, and learned treatises generally accepted as authoritative, and relied upon by experts in his field. All such treatises have been subject to peer review and published in medical journals/literature.

d. Copies of Dr. Grafton's current Curriculum Vitae and Fee Schedule are attached hereto as Exhibit "A" and incorporated herein by reference.

Respectfully submitted, this the 31<sup>st</sup> day of August, 2020.

MEKAIL THOMAS and EREAON SMITH  
PLAINTIFFS

BY: /s/ J. Stewart Parrish  
J. Stewart Parrish, MS BAR #10833

/s/BobbyMoak  
Bobby Moak, MSB #9915

**CERTIFICATE OF SERVICE**

I, the undersigned counsel, J. Stewart Parrish, counsel for Plaintiff, do hereby certify that I have on this dated delivered by U.S. mail, postage prepaid, a true and correct copy of the above and foregoing *Designation of Expert Witness* to:

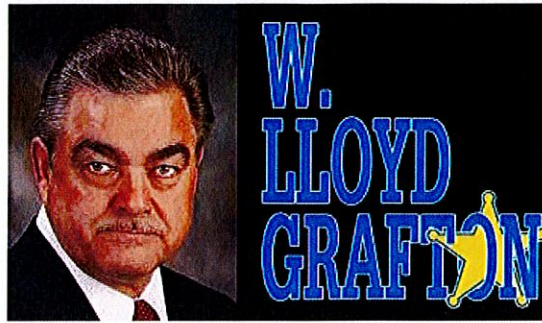
Brett W. Robinson, Esq.  
Hortman, Harlow, Bassi, Robinson & McDaniel, PLLC  
P.O. Box 1409  
Laurel, MS 39441-1409

This the 31<sup>st</sup> day of August, 2020.

Counsel for the Plaintiffs:

J. Stewart Parrish, MSB #10833  
Law Office of J. Stewart Parrish, P.A.  
P.O. Box 823  
Meridian, MS 39302  
601-696-4400  
601-696-4455(fascimile)

Mr. Bobby Moak, MSB #9915  
Law Offices of Bobby Moak, P.C.  
P.O. Box 2422  
402 Monticello Street  
Bogue Chitto, Mississippi 39629  
Tel. (601) 734-2566  
E-mail bobbymoak402@att.net



## W. Lloyd Grafton

3896 Highway 33  
Ruston, Louisiana 71270  
Phone: (318) 255-4214  
Cell: (318) 243-6669  
Fax: (318) 255-6254  
Email: lfgraston@gmail.com

### *Police Issues:*

- Training
- Use of Force
- Police Ethics
- Police Procedure
- Pursuit
- In Custody Issues
- Traffic Stops
- Search and Seizure
- Less Than Lethal Weapons
- K-9
- Self Defense
- Conceal Carry Issues
- Other Police Issues

*\*Accepted in Federal Court as Police Policy and Procedure and Use of Force Expert.*

*\*Accepted in Louisiana, Mississippi and Texas State Court as Use of Force Expert.*





# Resume

## Personal

- Career Status – U.S. Government Special Agent (Retired)
- Associate Professor Criminal Justice (ULM) (Retired)
- Top Secret Clearance (Gov. Employment)

## Education

- University of Southern Mississippi – EdD, December, 1997 Adult Education/Criminal Justice
- University of Southern Mississippi – Masters Criminal Justice, Minor, Public Administration, 1978
- Florida State University, Graduate Work Law Enforcement, 1968-1969
- Louisiana Tech University, Graduate Work Guidance and Counseling, 1968
- Louisiana Tech University, B.A., Social Science Education, Minor, English, 1967
- University of Maryland, College Credit (U.S. Military, 1961-1962)

## Military

### **June 1960 to June 1962**

Active Duty U.S. Army, Infantry, 16 months, Korea, 7th Cavalry B.G., 1st Cavalry Division Captain, Louisiana National Guard, Military Police MOS Served as training officer, reviewed civil disturbance training and inspected National Guard firearms storage security. Received Honorable Discharges June, 1966 and August, 1985.

## Experience

### **March 2013 to March 2017**

Louisiana State Police Commission Appointed by governor for 6 year term. A seven member body that has final authority over administration of the State Police Service, Louisiana.

### **May 2015**

Southern Arkansas University  
Criminal Justice Program  
Magnolia, Arkansas

Contracted to Evaluate Criminal Justice Program and Faculty, make recommendations for improvements and future graduate program.

**August 2009 to June 2013**

**Assistant Professor (Retired)**

GRAMBLING STATE UNIVERSITY

Criminal Justice Building, Grambling, Louisiana

(318) 274-7818

As a Professor of Criminal Justice, my duties consist of teaching law enforcement courses such as Law Enforcement, Industrial Security, Criminal Procedure, Interview and Interrogation and Police Report Writing. I also advise students concerning their curriculum. I serve on several university committees and continue to work as a consultant concerning police issues.

**January 1994 to August 2009**

**Associate Professor**

UNIVERSITY OF LOUISIANA AT MONROE

209 Stubbs Hall, Monroe, Louisiana 71209

(318) 342-1442

As an Assistant Professor, my duties consist of teaching both graduate and undergraduate courses. I have instructed in Intro Criminal Justice, The Police, Substance Abuse, Police Society, Organized Crime, Criminal Justice Research and Criminal Procedure. I advise approximately 100 students. I also instruct at the North Delta Regional Training Academy in Interview and Interrogation, Use of Force, Courtroom Testimony, Informants and other Police Issues.

**January 1994 to 2016**

**Instructor**

DELTA COMMUNITY COLLEGE DELTA POLICE ACADEMY, Post Certification Training; I instruct in interview and interrogation, court room testimony, use of force, police liability issues, search and seizures, and other police training issues.

**October 1996 to November 2003**

**Contract Investigator**

M&M SECURITY SERVICES, INC.

7337 Hanover Parkway, Greenbelt, Maryland 20770

Duties consist of pre-employment background investigations for U.S. Customs Service.

Backgrounds are conducted on education, employment, neighborhood and police records. I hold a clearance at MSM for both U.S. Customs and Department of Defense.

**January 2000 to November 2004**

**Contract Investigator**

DYNCORP

11710 Plaza America Drive, Reston, Virginia 20190

Duties consist of pre-induction background investigations and security update clearance for the Defense Investigative Service, U.S. Department of Defense. Backgrounds are conducted on credit, neighborhood, education, employment, and police records.



**January, 2000 to January 2004**

**Instructor (Part-time)**

LOUISIANA COMMUNITY POLICING INSTITUTE

Louisiana State University – Shreveport One University Place, Shreveport, Louisiana 71115

As an instructor for the Louisiana Community Policing Institute, duties consist of preparing seminar material and presenting seminars on Preventing School Violence, Conflict Resolution Skills, Stress Management, Leadership and Supervision Skills, and Ethics and Integrity.

**January, 1998 to March 2003**

**Safe School Consultant/Contract**

LOUISIANA STATE DEPARTMENT OF EDUCATION

Region 8, Monroe, Louisiana

Duties consist of consulting and lecturing to public school employees on school violence issues in a sixteen parish area in Northeast Louisiana. Wrote School Crisis Response Plans and trained School Resource Officers.

**January, 1998 to Present**

**Police Policy and Procedure Consultant**

3896 Hwy. 33, Ruston, Louisiana 71270

As a consultant, I advise law enforcement departments and trial lawyers on issues such as use of force, police pursuits, firearms, and other police issues usually addressing liability issues.

**September, 1990 to January, 1994**

**Assistant Professor**

SOUTHEASTERN LOUISIANA UNIVERSITY

P.O. Box 902, Hammond, Louisiana 70401-0902

(504) 549-2110

As an instructor in the Department of Social Work, Sociology, and Criminal Justice, duties consisted of teaching Introductory Criminal Justice, Criminal Justice Administration, Business and Industrial Security, Criminal Investigation, Drug Traffic and Organized Crime, Comparative Criminal Justice, Criminal Law and Criminal Justice Independent Study. Served as advisor to approximately 125 Criminal Justice majors at the freshman through senior level, as well as Junior Division advisor. Served as sponsor for the Criminal Justice Fraternity, and taught a 15-hour load.

**May, 1987 to January, 1993**

**President**

MERIT UNLIMITED (Investigative and Loss Prevention)

703 Chic a Dee Court, Slidell, Louisiana 70461

(504) 641-3009 or 361-7932

Merit Unlimited was a security advisory company and an investigative service for personal injury attorneys. Duties consisted of investigating accident scenes, interviewing witnesses, making evaluations and recommendations to law firms, providing services to clients of law firms, and providing services to clients during litigations. Work mainly involved oil field accidents and maritime law litigation.

**June, 1972 to January, 1990**

**Special Agent (Retired)**

BUREAU OF ALCOHOL, TOBACCO AND FIREARMS

U.S. Treasury #2 Canal Place, Suite 1930 W, New Orleans, Louisiana 70130

Duties consisted of enforcing federal firearms laws, explosive regulations, and other federal regulations; served on the Organized Crime and Arson Squad and was responsible for the Career Criminal Project, which consisted of identifying and concentrating efforts to apprehend persons involved in crime as a way of life; public speaking and training police officers; and assisted the Secret Service in protection of presidential candidates and dignitaries. Was involved in extensive undercover work for ATF during 17 year career. Served as an Instructor at the Federal Law Enforcement Training Center in Glynco, Georgia.

**July, 1969 to June, 1972**

**Special Agent**

BUREAU OF NARCOTICS AND DANGEROUS DRUGS

U.S. Justice Department, Dallas, Texas

As a Special Agent, conducted investigations on suspected drug violators, obtained evidence on which to secure and serve warrants, established surveillance, developed evidence and informants, participated in raids, and other law enforcement duties. In addition, prepared case reports, testified in court, and prepared audits on controlled drug dealers. Was in charge of Special Agent training for the Texas-Oklahoma Region, and arranged and participated in 34 three-day seminars for local and state drug enforcement officers.

**February, 1968 to July, 1969**

**Educational-Vocational Counselor**

FEDERAL BUREAU OF PRISONS

U.S. Justice Department, Tallahassee, Florida

Duties consisted of acting as advisor for 120 men in a correctional institution. Prepared analyses; sat on a classification team; instructed for four hours each day in a classroom setting, and assisted the correctional officers in time of riot and disorder within the prison. Received Correctional Officer Training due to this responsibility.

**February, 1967 to February 1968**

**Pre-vocational Teacher**

LOUISIANA DEPARTMENT OF HOSPITALS

Ruston State School, Ruston, Louisiana

Duties consisted of working with socially and mentally challenged boys ranging from 7 to 17 years of age; evaluated each child, and made recommendations as to his vocational aptitude, and to what area of training he was best suited to participate.



## Courses Taught and Developed

- Policing
- Use of Force
- Safe Schools
- Substance Abuse
- Police Society
- Drug Identification
- Search and Seizure
- Development of Informants
- Undercover Investigation
- Criminal Investigation
- Organized Crime
- Business and Industrial Security
- Criminal Law
- Introduction to Criminal Justice
- Interview and Interrogation
- Police Report Writing
- Jail Extraction
- Corrections
- Comparative Criminal Justice
- Drug Investigation
- Firearms Enforcement
- Crisis Prevention in Schools
- School Violence Prevention
- Conflict Resolution Skills
- Stress Management
- Ethics and Integrity
- Refuse to Be A Victim
- Arson Investigation
- NRA Pistol Course and Personal Protection
- Death Scene Investigation
- Terrorist: Domestic/International
- Healthcare Security Training
- Conceal Carry Training
- Law Enforcement Issues

## Related Professional Training

- Homeland Security: Police Response to Terrorists, November, 2002
- Understanding Islamist Terrorism Seminar, March, 2003
- Crisis Prevention Institute Training, Jackson, Mississippi, April 1999
- Refuse to be a Victim Instructor School, Fort Walton Beach, Florida, 1998
- Certified Instructor of National Rifle Association in Pistol and Personal Protection Training, 1996

- Attended the National Meeting of the Academy of Criminal Justice in Chicago, Illinois, 1994.
- Attended the National Meeting of the Academy of Criminal Justice in Albuquerque, New Mexico, 1998
- National Training Academy, Washington, DC Federal Narcotics Agent Training, 1969
- Treasury Law Enforcement Academy, Washington, DC Special Agent Training, 1973
- Tallahassee Police Academy, Tallahassee, Florida, 1968
- IRS Instructor School, Dallas, Texas 1972
- Firearm and Bomb School, San Antonio, Texas, 1973
- Advanced Bomb School, Glynco, Georgia, 1983
- Secret Service Protection Training, Atlanta, Georgia, 1984
- Interview and Interrogation Seminar, New Orleans, Louisiana, 1983
- Arson for Profit School, Glynco, Georgia, 1985
- Undercover Investigation School, Federal Law Enforcement Center, Glynco, Georgia, 1986
- Street Survival Seminar, New Orleans, Louisiana, 1987
- Homicide Investigation, Jefferson Parish Coroner's Office, Kenner, Louisiana, December, 1992
- Gang Prevention Training, New Orleans, Louisiana, January, 1993
- National School Safety Leadership Training, National School Safety Center, Fort Worth, Texas, May, 1999
- National Institute of Justice, Death Scene Investigation, University of Baltimore, Maryland, 2001
- National Rifle Association Training Counselor Seminar
- Berryville, Arkansas, January 2007
- International Association for Healthcare Security Training, June 2007
- Instructor Certification Training -Specialty Impact Munitions -Oleoresin Capsicum Aerosol Projectors -Chemical Munitions -Distraction Devices Defense Technology, Irving, Texas Oct 20-23, 2008
- Taser Instruction Training, Taser X26 and Advanced Taser M26, Taser International, Scottsdale, Arizona, December 2008
- DWI Detection and Field Sobriety Training, Grambling State University, December 2009
- PPCT Defensive Tactics Instructor, Dec 12-16, 2011, Texas A&M, Bryan, Texas
- Louisiana Association for Justice Seminar, May 17, 2013 New Orleans, LA Seminar on Taser and K-9 in Police Issues
- Taser Training, LA State Police, Bossier City, 2013
- Force Science Certification, February 2014
- Excited Delirium and Agitated Chaotic Events Instructor Training, 2015
- Recognizing, Responding, Preventing and Investigating Arrest – Relaxed In-Custody Deaths, Birmingham, Alabama, Jan, 2015
- Prison Rape Elimination Act Auditor Training, San Diego California, May 2015
- FLETC Emergency Driving Course, 40 Hours, January 2016
- National Institute of Corrections, Investigating Sexual Abuse in a Correctional Setting, January 27, 2018



- Officer Involved Shooting: Essential Investigation Techniques, National Business Institute, March 2, 2018
- PREA Training; Criminal and Administrative Investigations Feb 2020
- PREA Training; Justice Detention Center Feb 2020
- PREA Training; Supervision and Monitoring Feb 2020
- PREA Training; Inmate Education Feb 2020
- PREA Training; Voyeurism-An Invasion of Privacy of an Inmate by Staff

## Awards

- Elected to Who's Who Among America's Teachers, 1994 at Southeastern Louisiana University
- Elected to Tau Kappa International Social Science Honor Society, Florida State University, 1969
- Certificates of Achievement, U.S. Treasury (four times)
- Commendation for Undercover Work by the Prime Minister of the Commonwealth of Dominica, Eugene Charles, 1985
- Recommendation for quality step increases for investigation (three times) Certificate of Appreciation, U.S. Treasury Department
- Certificate of Appreciation, Department of Justice
- Certificate of Merit, Drug Enforcement Administration for undercover drug investigation
- Monetary award for Special Agent training, Department of Justice, Dallas, Texas, 1973
- Selected Outstanding Instructor by scholastic honor society in the College of Arts and Science at University of Louisiana, 1996
- Many letters of recommendation for criminal investigation, undercover work, and law enforcement schools.
- Elected to Who's Who Among Americas Teachers 2007 at the University of Louisiana at Monroe
- Received Faculty Recognition Award for Teaching and Mentoring ULM Scholar Athletes 2007

## Organizations

- American College of Forensic Examiners
- American Society for Law Enforcement Training
- Louisiana Peace Officers Association
- International Narcotics Association
- Federal Investigators Association
- National Association of Security Managers
- Texas Cattleman's Association (Honorary Special Texas Ranger)
- National Rifle Association
- Lions Club International
- Louisiana Teachers Association
- Louisiana Tech University Alumni Association
- Gideon's



- Veterans of Foreign Wars
- International Law Enforcement Educators and Trainers Association (ILEETA)
- The Heritage Foundation
- Law Enforcement Legal Defense Fund

## Case History

➤ Attorney John McKay, Baton Rouge, La,  
Re: Jo Neal Frances vs. Wayne Melancon,  
Lack of Medical Care at Lockup  
Report, Settled

➤ Attorney Wanda Davis, August 2010,  
Re: Adrian Clauder vs. Wayne L. Jones, Sheriff, St. John the Baptist,  
Excessive Force during Arrest  
Consultation and Report, Settled

➤ Attorney Carlos Moore,  
Re: Shawn Johnson vs. Hines County Sheriff's Department  
Consultation July 2010

➤ Attorney Brent Corell, June 2010,  
Re: Veronica and Manuel vs. Logan Simon, City of Ville Platte,  
Failure to follow Police Procedure, Auto Wreck Death  
Report

➤ Attorney Anthony Marinaro,  
Re: Anthony Brown vs. Jack Strain, Jr.,  
Death in Custody  
Report June 2010, Deposition, Settled

➤ Attorney Marcus Bryant,  
Re: Pierre Batiste vs. Sheriff St. Martin Parish,  
Taser, Excessive Force  
Consultation and Report, July 2010

➤ Attorney Joseph Long,  
Re: Fontentos vs. Sheriff Livingston Parish, July 2010,  
Excessive Force, Four Wheeler  
Consultation and Report, Settled

➤ Attorney Michael Barras, New Iberia, La.  
Price vs. Acadia Parish Sheriff's Office, 15th Judicial Court  
Use of Force – Parade Route  
Consultation and Report

➤ Attorney Payton Murphy, Baton Rouge, La.  
Plain vs. Patin et al, 19th Judicial Court  
State Police Hit Vehicle in Rear  
Consultation and Report, Settled

➤ Attorney Deborah Villio, Metairie, La.,  
Goutierrez vs. Kenner P.D., Pursuit Accident  
Consultation and Report

➤ Attorney Todd Clemons, Lake Charles, La.  
Police Shooting of Warren Lawrence  
Consultation, December 2010

➤ Attorney Wendel Fusilier, Ville Plate, La.  
Ryder vs. Acadian Parish Sheriff's Office  
Escape from Jail, Accident with Injury  
Consultation, Report, Settled, November 2010

➤ Attorney Carlos Moore, Grenada, Ms.  
Bonney vs. Leflore County  
Excessive Force, January 2011  
Consultation and Report

➤ Attorney Carlos Moore, Grenada, Ms.  
Re: Burton vs. City of Jackson,  
Consultation, Report, Shooting of Moore, Violation of Procedure, Report, Deposition, Trial

➤ Attorney Michael Barras,  
Re: Gueydan P.D. vs. Hughes  
Invalid Search & Seizure, Report

➤ Haik, Minville & Grubbs,  
Re: Sally Smith vs. Lafayette Parish  
Report, Excessive Force – Broken Arm, Consultation and Report, Settled

➤ James Clary & Assoc.,  
Carlos Harris vs. Baton Rouge P.D.  
Shooting in Car at Club, Excessive Force, Report

➤ Rabalais & Herbert, Attorney Joan Wallace,  
Re: Eisler vs. Lafayette P.D.  
Accident on I-10, Debris in Roadway, Report, Settled

➤ Attorney Carlos Moore,  
Re: Hayes vs. LeFlore County  
Excessive Force, Initial Report

➤ Harrington Law Firm,  
Re: Sherman vs. Alexandria P.D.  
Excessive Force – Dog Bite, Dismissed

- Attorney Claiborne,  
Re: Jurnell Smith vs. Bobby Guidroz  
Excessive Force, Report and Deposition 2011, Trial
- Attorney J. Long,  
Re: Stranjac vs. Bernard and Town of Walker  
Excessive Force K-9, Report and Deposition, Settled
- Attorney Scott Wilson,  
Re: Dr. Cefalu vs. Sheriff Edwards  
Excessive Force, Consultation and Report, Trial, August 2012
- Attorney Frank Silvestri,  
Re: Jeffry Ders: Swat Negotiators  
Consultation, October 2012
- Attorney Rudie Soileau,  
Re: Cleve Ritchie  
Consultation, Excessive Force, Report, Trial, December 2012
- Attorney Charles Thomas,  
Re: Michael Dunbar Casino  
Excessive Force, Settled, November 2012
- Attorney Michael Glass,  
Re: Louie Marshal vs. City of Baton Rouge  
Consultation, Traffic Stop/Accident  
Consultation and Report, April 2012
- Attorney Donna Grodner,  
Re: K-9 Cases  
Consultation
- Attorney Marcus Plaisance,  
Re: Amanda McNeil  
K-9 Attack, Consultation and Report, Settled, July 2012
- Attorney Gary Boutwell,  
Re: Haley Young vs. State of Louisiana  
Consultation and Report, November 2012
- Attorney Jarvis Claiborne,  
Re: Shelvin vs. Lafayette Parish Sheriff Office  
Jail Suicide, Consultation, July 2013
- Attorney Gerald Weeks,  
Re: Byrd vs. City of Bossier  
K-9 Case, Consultation and Report, July 2013, Dismissed



➤ Smith Shanklin Sosa, LLC,  
Re: Carolina vs. LSU Police  
Excessive Force, Consultation, April 2013, Report and Disposition.

➤ Attorney Tangela Hollis,  
Re: Williams vs. City of Aberdeen, MS  
Excessive Force, Consultation, Report, July 2013

➤ Attorney Wilson,  
Re: Laflour vs. Houston P.D.  
False Arrest, Deposition, 2013, Dismissed

➤ Attorney Carlos Moore,  
Re: Washington vs. Oktibbeho County  
Excessive Force, Taser, Settled, Report, 2013

➤ Attorney Hollis,  
Re: Hines vs. City of Clarksville  
Report, 2013

➤ Attorney Wilson,  
Re: Arriage vs. McTague  
K-9, 2013

➤ Attorney Davenport,  
Re: Patrick Smith  
Armed Robbery, Plea, Settled, 2013

➤ Attorney Tregg Wilson, Baton Rouge,  
Hernandez vs. Theriot  
Chief of Police Criminal Conduct Consultation, March 2014

➤ Attorney Mumford, Jackson, MS,  
Joseph Adams  
Murder Charge, Consultation

➤ Attorney Rick Putman, Abbeville, LA,  
Charles Harrington  
Murder Charge, Consultation

➤ Attorney Edwin Dunahoe, Natchitoches, LA,  
Boyt vs. City of Natchitoches  
Excessive Force, Consultation, Settled

➤ Attorney Hughey, TX,  
Re: Marcus Slade  
Taser Death, Consultation, Report, Deposition

- Attorney Register, Lafayette, LA,  
Re: Randell vs. Opelousas  
Police Officer Excessive Force, August 2014
- Attorney Rick Gallot, Ruston, LA,  
Re: Bastrop Police Department  
Taser Case, August 2014
- Attorney Phil Boudousque, New Orleans, LA,  
Re: Trege vs. Greg Champagne, St. Charles Sheriff  
Reckless Operation of Police Vehicle, February 2014
- Attorney Willie Johnson, Baton Rouge, LA,  
Re: Janlee Beard vs. Tangipahoa Sheriff's Office  
Excessive Force, April 2014
- Attorney Willie Johnson, Baton Rouge, LA,  
Re: Lee vs. Leroy Wells  
Bicycle Death, Consultation, November 2013
- Attorney Carol Lexing,  
Re: Smith vs. Rapides Parish Sheriff's Office  
Excessive Force and False Arrest, Consultation, August 2014
- Attorney Carol Lexing,  
Re: Victor White  
Consultation, August 2014
- Attorney Cloyd Benjamin, Natchitoches, LA,  
Re: Patterway vs. Shreveport Police Department  
Violation of Policy, January 2014, Report
- Attorney Tod Tefteller,  
Re: Bobby Madewell, Consultation and Report  
Taser Death Case, 2014, Settled
- Attorney Donna Grodner,  
Re: Edwards vs. Sheriff Cazes,  
Taser Death Case, Report, 2014
- Attorney Pennington and Martinez,  
Re: Kent vs. Town of Clinton,  
Consultation, Report and Deposition, No PC for an investigation, September 2014, Settled
- Attorney Treg Wilson,  
Re: LaBaux vs. St. John Sheriff's Office,  
Taser Death, Consultation, 2014

- Attorney Vergis,  
Re: Barber vs. City of Shreveport,  
Excessive Force, Consultation, December 2014
- Attorney Miller,  
Re: Barton vs. Tutwiler, Miss. consultation report;  
Excessive Force – Taser, September 2014
- Attorney John Smith  
Porter Investigation, Murder, October 2015
- Attorney Melvin Miller  
Travis F. Griggs vs. Leflore County, Miss.  
Excessive Force at Club, Consultation, Report
- Attorney Thomas Davenport  
Ahearn vs. City of Alexandria  
Search Warrant and Property Issues, Consultation
- Attorney Ed Jones  
LSU vs. Kin Fulton  
Excessive Force – Employment Issues, Report, Hearing
- Attorney James Bolin  
Weaver vs. Shreveport P.D.  
Consultation, Report, Settled
- Attorney Fusilier  
Fowler vs. City of Natchitoches  
Excessive Force, Report
- Attorney Larry Keilberg  
Grisham vs. Temple, Texas  
Excessive Force and False Arrest, Report
- Attorney Betty Marak  
Police Defender; US Government vs. Willie Fred Knowles , Western U.S. Dist Court, La  
Civil Rights Charge, Report, Plea
- Attorney Chris Sices  
LSU, Excessive Force, 2013
- Attorney Debra Villio  
Watero vs. Kenner P.D.
- Attorney Chris Ieyoub  
Carpenter vs. City of Sulphur  
Dog Shot, Report, Settled



- Attorney Donna Grodner  
Savoy vs. Angola, Middle Dist., U.S. Dist. Court, La.  
Excessive Force, September 2015
- Attorney Vercell Fiffie  
Randle vs. St. John  
Excessive Force, Dismissed
- Attorney Carlos Moore, 2016  
Adrian Jackson vs. Shooting at Club, St. Court, Mississippi  
Excessive Force, Consultation
- Attorney Chris Washington, 2016  
Corey Cheek Shot  
Rapides Parish, Consultation
- Attorney Alex Washington, 2016  
Grant vs. Natchitoches P.D., Western Dist, U.S. Dist Court, La.  
Excessive Force, Report
- Attorney Thomas Hoval, 2016  
Walken vs. Caddo Parish  
Excessive Force, Report
- Attorney Bradley Lewis, 2016  
McMahon vs. Richland Parish, St. District Court La.  
Sexual Assault and Police Procedure Violation  
Report and Deposition, Settled
- Attorney Greg Malta, 2016  
Dunn vs. Louderdale County  
Excessive Force, Shooting
- Attorney Debra Villio, 2016  
Jarreau vs. City of Kenner  
Policy & Procedure, NCIC
- Attorney Donna Grodner, 2016  
Brian Porter vs. Det. Hear, Beard & Off. Barbin  
Policy & Procedure Violation
- Attorney Greg Malta, 2016  
Ryan vs. Hard Rock Casino  
Report, Dismissed
- Attorney Nancy Cronin, 2017  
Griseto vs. Roswell Correctional Center, State Dist Court, New Mexico  
Correctional Policy and Procedures  
Report

➤ Public Defense Valerie Jusselin, July 2017

USA vs. Jarvis Hardy, Eastern Dist, U.S. Dist Court, New Orleans  
Drug Search Warrant  
Consultation

➤ Attorney Larry Marcus, 2017

Karl Rougemont vs. New Mexico Law Enforcement Academy  
Law Enforcement Training Issues, New Mexico St. Court  
Report and Deposition, Settled

➤ Attorney Jill Craft, 2017

Bajoie vs. City of Baton Rouge, 19th Dist. Court, Baton Rouge La.  
Excessive Force, Taser

➤ Attorney Katie Beaird, 2017

Sibley vs. Paulk  
Excessive Force, Jail  
Report, Settled

➤ Attorney Donald Hathaway

Muslow vs. City of Shreveport  
Excessive Force, U.S. Dist Court, Western Dist.La.  
Report

➤ Attorney William Helm, Attorney Stephen Butterfield, 2017

Marchand vs. St. Helena Sheriff's Office  
Policy and Procedures, Training Violations  
Report

➤ Attorney Allen Pesnell

Konard vs. T.A. Kolb  
Excessive Force  
Report, Settled

➤ Attorney Lucretia Pecante, 2017

Michael Noel vs. St. Martin Sheriff's Office  
Excessive Force  
Report, Case Never Failed in Court

➤ Attorney David Benoit, 2017

Marilyn Calais vs. Iberia Parish Sheriff's Office  
Training Issue

➤ Attorney Cloy Benjamine, 2017

John Kite vs. Rapides Parish Sheriff's Office, 9th Judicial Dist. Court, La.  
Policy and Procedures, Failure to Supervise  
Report

- Attorney Brad Lewis, 2017  
Patricia Bailey vs. City of Bogalousa  
Policy and Procedures  
Report
- Attorney Donna Grodner, 2017  
O'Neal Gilbert vs. Maj Shannon Lessard  
Excessive Force, Correctional Center  
Report
- Attorney Greg Malta, 2017  
Bobby Smith vs. Lincoln County Mississippi  
Policy and Procedures, Report, Settled
- Attorney Greg Malta, 2017  
Cortez Martin vs. Town of Tutwilder  
Excessive Force  
Report, Settled

#### **2018 Case Load**

- Attorney Donna Grodner  
Jonathan Jacobs, Middle Dist, U.S. Dist Court  
Excessive Force  
Report 2018
- Attorney Donna Grodner  
Timothy Gray Vs Maj. White  
Excessive Force U.S. Dist Court, Middle Dist, La.  
Report 2018
- Attorney Donna Grodner  
Blane Landry  
Excessive Force, U.S. Dist Court, Middle Dist, La  
Report 2018
- Attorney Donna Grodner  
Sidney Arnold vs Dep Williams  
Excessive Force, U.S. Dist Court, Middle Dist, La  
Report 2018
- Attorney Donna Grodner  
David Essex vs Lt. Col Rheams  
Excessive Force, U.S. Dist Court, Middle Dist, La  
Report 2018
- Attorney Yigai Bander  
Pol Off Jared Neyland  
Police Escort  
Report 2018



➤ Attorney Yigai Bander  
Pro Kosh Rayamaijhi vs St. Pol  
Sr. Police Investigation  
Report 2018, Settled

➤ Attorney Kevin Stockstill  
Pol Off Cody Dodge  
Criminal Case , U.S. Dist Court, Western La.  
Report 2018, Trial

➤ Attorney Brent Coon  
Houston, TX  
Robin Custer  
Criminal Trespass  
Report 2018

➤ Attorney John Thomas  
Beaumont, TX  
Bandito Shoot Out  
Report 2018

➤ Attorney Rusty Messer  
Lisa Causer vs Livingston Par. S.O.  
Excessive Force , U.S. Dist. Court, Middle La.  
Report 2018

➤ Attorney Nelson Cameron  
William Carter vs City of Shreveport  
Failure to Treat Medically, U.S. Dist Court, Western Dist, La.  
Report 2018

➤ Attorney John McKay  
Rickey Riley  
Casino Security  
Report 2018

➤ Attorney George Recile  
Patria Gonzales vs St. Pol. Orleans Dist. La.  
Excessive Force, Deposition  
Report 2018

➤ Attorney Greg Chiartano  
Tucker, Excessive Force  
Report 2018

➤ Attorney Jeff Bassett  
Ashley Lasseigne  
Auto Crash Scene  
Report 2018, Settled

➤ Attorney Chris Alexander

Spears Stevenson vs Sheriff Gautreaux, U.S. Middle Dist. La.  
Excessive Force  
Report 2018

➤ Attorney James Carter

Shawn Brown vs City of Atlantic City  
Excessive Force, U.S. Dist. Court, Dist. of New Jersey  
Report 2018

➤ Attorney Greg Malta

Andre Wilson  
Excessive Force  
Report 2018

➤ Attorney Greg Malta

Green vs. Old South Pawn, Adams County, St.of Miss.  
Report 2018

➤ Attorney Matt Walton

Poirier vs. Ryan Motors  
Pursuit, State Court Miss.  
Report 2018

➤ Attorney Edward Moses

Michael Williams  
Search Warrant  
Report 2018

➤ Attorney Gina Palermo

David Regier vs Rouse's Civil Dist Court, Orleans, La  
Security Guard  
Report 2018

➤ Attorney Jay Luneau

Billy Graham  
Excessive Force Casino  
Report 2018

➤ Attorney Clay Burgess

New Iberia Deputy  
Excessive Force  
Report 2018

➤ Attorney Donna Grodner

Anthony Fontenot  
Corporal Punishment  
Report 2018

- Attorney Gregory Carter  
St of Louisiana vs James Nero, New Orleans, Dist Court  
Murder Trial, Report, Trial
- Attorney Stewart Parrish  
McKail Thomas vs Laurel PD  
Excessive Force, Report
- Attorney Jeff Easley  
Thigpin vs Grant Parish, 35th Judicial Dist Court, Grant Parish, La  
Failure to Protect, Report
- Attorney Josh Maness  
Collins vs Charles Dotson, Rep, U.S. East Dist Texas  
Excess Force, 2019
- Attorney Donna Grodner  
Santos vs Major White, U.S. Middle Dist La  
Excessive Force, Report 2019
- Attorney Donna Grodner  
Jones vs Major Lollis, Cap Jones, U.S. Middle Dist La  
Excessive Force, Report 2019
- Attorney Donna Grodner  
Savoy vs Stroughter, U.S. Middle Dist La  
Excessive Force, Report 2019
- Attorney Donna Grodner  
Wilson vs Warden Deville  
Excessive Force, Report 2019, U.S. Western Dist, La.
- Attorney Greg Maita  
State of Miss. vs Amanda Hall  
Consultation, Criminal Case, Pike County, Miss.
- Attorney Villio  
Garcia vs Kenner PD  
Trial Jefferson Parish, Div P, Judge Faulkner
- Attorney Lexing  
John Jackson vs Town of Bernice, State Dist. Court, Monroe, La.  
Excessive Force, Report, Settled



# Fee Schedule

**Retainer:**

\$4,750.00 (*\$1,750 Up-Front*) Review and evaluate information, prepare reports, travel, consult with attorneys and other participation or activity requested or required up to court.

**Hourly Rate:**

\$150.00 per hour – Trial

**Deposition:**

\$1,500.00

**Attending Court / Testifying:**

\$150.00 per hour

**Mileage:**

50 cents per mile

**Expenses:**

Billed at cost (Hotel, Parking, etc.)